

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
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December 19, 2011

Patrick H. West, City Manager
City of Long Beach – Office of the City Manager
333 West Ocean Boulevard – 12th Floor
Long Beach, CA 90802

Re: Proposed Development at 2nd St. and Pacific Coast Highway

Dear Mr. West:

On Tuesday, December 20 the Long Beach City Council will consider a coastal development permit (CDP) that will require amendments to change zoning and Local Coastal Plan land use permitted uses and other development requirements for a single parcel of land located at Second Street and Pacific Coast Highway (2nd and PCH) in the southeast corner of the City. The subject parcel is located within the Southeast Area Development and Improvement Plan (SEADIP) Sub-area 17 of the City's certified Local Coastal Plan (LCP).

The changes in land use and development standards include increasing building height requirements from the current 35-foot limit to allow for one 12-story residential/hotel tower and other building in the 55 ft. to 75 ft. range. Residential development, which is not currently permitted on the subject site, is proposed as a permitted use on the currently zoned commercial parcel that contains a hotel and related commercial uses. Visitor-serving commercial development, particularly affordable overnight accommodations, is a priority use pursuant to the California Coastal Act while residential development is not a priority use. The current proposal is for a mixed-use project consisting of 275 residential units, 175,000 square-feet of retail space, restaurant space and a 100-room hotel.

In discussions with City staff over the past year Commission staff has consistently stated concerns relative to the proposed project at 2nd and PCH. Specifically, staff has recommended that any significant changes to the use and development standards for this parcel should be considered only as a component of a comprehensive review and LCP update of the existing SEADIP (including the currently uncertified portion incorporated from Los Angeles County in the 1980s). It is reasonable to expect that other property owners of commercially developed parcels along PCH would expect to receive similar development entitlements from the City in the future. Commission staff believes that the only way to determine the true development potential of any single parcel within the SEADIP is via an LCP update that takes into account the cumulative impacts of all potential future development in this plan area including the parcels currently containing or potentially containing wetlands.

Increases in traffic at 2nd and PCH and other nearby intersections have been raised by project opponents and is certainly a legitimate Coastal Act Issue relative to public access to and along the coast. The subject site is located in an area of the City where PCH meets Alamitos Bay

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and the ocean and provides a gateway to coastal cities in Orange County. The subject site is also located adjacent to the Los Cerritos Wetlands, an area containing native plant and wildlife habitat that is provided protection under the Coastal Act. Consideration of allowable uses on any parcel within SEADIP must also give equal consideration to the protection and provision of public access to coastal waters, protection and enhancement of wetlands, and an adequate allowance for priority uses.

Relative to Coastal Act priority uses, we note that the proposed Local Coastal Plan Amendment for SEADIP Sub-Area 17 does not contain a policy or program to mitigate for the loss of affordable overnight accommodations which are protected under the Coastal Act. Therefore, we recommend that any update of SEADIP Sub-Area 17 include policies, ordinances, or a program that would require mitigation for the loss of existing low-cost overnight accommodations or for new construction of high-cost overnight accommodations consistent with recent Commission action on LCP updates concerning Long Beach and other coastal cities in southern California. An affordable overnight accommodations mitigation policy was included as a suggested modification for approval in the Commission's action on the City's LCP Amendment No. 1-10 concerning the Golden Shore Master Plan within the Downtown Shoreline Planned Development District.

Regarding wetland parcels we believe that it is extremely important to determine the extent of wetlands and the potential or lack of potential for development of wetland parcels in any update of SEADIP. We recommend that the City consider the development of a Transfer of Development Rights (TDR) program for this sub-area that could tie future development or redevelopment of existing parcels along PCH, particularly new development that proposes some level of increase in height, density or use, to a program or requirement that would only allow such development in exchange for retirement of development rights or potential on properties within the wetlands.

We are hopeful that the City Council will consider our comments and delay action on the proposed project in order to allow City and Commission staff to continue discussions on developing a comprehensive LCP amendment for SEADIP.

Sincerely,



Gary E. Timm
Coastal Program Manager

cc: Jack Ainsworth
Charles Posner
Amy Bodek
Derek Burnham